

Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

April 30, 2012

In the Matter of	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	
	)	
Lifeline and Link Up	)	WC Docket No. 03-109
	)	
Federal-State Joint Board on Universal	)	CC Docket No. 96-45
Service	)	
	)	WC Docket No. 12-23
Advancing Broadband Availability Through	)	
Digital Literacy Training	)	

Dear Sir/Madame:

I am writing today in response to the FCC's Notice of Proposed Rulemaking which, among other things, proposes a Digital Literacy Pilot to fund schools and libraries operating digital literacy training courses. Before delving into my response to the proposed pilot, I want to first thank the FCC for your continued support for the E-Rate program. The E-Rate program provides critical discounts to assist schools (like districts in Southwest Washington State) to obtain affordable telecommunications and internet access.

Staying the course with the original intent of the federal E-Rate program is critical to the continued provision of telecommunications discounts to school districts. Districts in Southwest Washington range in size from 25 to 27,000 students, and include urban and rural districts. Regardless of their size or rural eligibility factor, ***all of our districts benefit from the E-Rate program's current administrative and fiscal operation***, which brings approximately \$1.4 million of the state's \$22 million in telecommunications discounts to districts in our region.

The pilot would provide grants to K-12 schools and libraries, lasting four years, to hire trainers, conduct training courses and provide resources/materials to those who lack digital literacy skills. While the FCC does not propose to fund the pilot using E-Rate funds, it does propose implementing and administering the program through the same division that oversees the E-Rate program. Specifically, the FCC proposes implementing/administering the program through the Schools & Libraries Division of the Universal Service Administrative Company (USAC).

While Educational Service District 112 ***does*** support a federal role to develop digital literacy skills for all citizens, ***we oppose using E-Rate's limited funds and administrative structure to establish and operate a new initiative***. E-Rate recipients already face existing challenges with the application and appeals process, and adding a new program to administer would slow things down even more. For example, districts apply for their E-Rate discounts approximately six months in advance of the funding year, but often don't receive

confirmation of their discount levels until eight to twelve months later, which speaks to the already over-burdened E-Rate program. To use E-Rate resources to implement and administer the Digital Literacy Pilot would create further delays and jeopardize the original intent and timelines for E-Rate applications and appeals processes, creating auditing problems, and resulting in problematic precedents for E-Rate's eligible services.

Thank you for considering my response as you move forward with your decision on the Digital Literacy Pilot. I applaud the FCC for its continued efforts to protect the already oversubscribed E-Rate program by not funding the pilot with E-Rate funding. I urge you to take similar protective measures when it comes to the implementation and administration of the pilot; please ensure that critical, limited E-Rate resources—both fiscal and administrative—are protected.

Sincerely,

A handwritten signature in black ink, reading "Twyla G. Barnes". The signature is fluid and cursive, with the first name "Twyla" being more prominent and the last name "Barnes" following in a similar style.

Dr. Twyla Barnes, Superintendent  
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